

October 11, 2024

VIA ECF

Honorable Judge Donna M. Ryu
U.S. Chief Magistrate Judge
United States District Court
Northern District of California
1301 Clay St
Oakland, CA 94612

Re: *American Civil Liberties Union v. U.S. Immigration and Customs Enforcement, et al.*, No. 23-cv-03450-DMR

Dear Judge Ryu:

In accordance with the Court's September 20, 2024 Order, ECF No. 63, the Parties have met and conferred regarding outstanding issues in this case. The following outlines the remaining issues in this case and a proposed schedule for addressing them.

The Parties agree that all issues relating to the merits of Plaintiff's FOIA request have been resolved either through Defendants' production of documents or the Court's ruling on the Parties' cross-motions for summary judgment. Plaintiff intends to assert a claim for attorneys' fees and costs.

The Parties seek a brief period of time to attempt to negotiate the fees/cost issues. Plaintiff will provide Defendants with billing records for purposes of negotiation by October 25, 2024. If the Parties cannot come to agreement by November 22, 2024, the Parties will submit a proposed stipulation setting forth a briefing schedule for Plaintiff to file a motion for costs and fees for resolution by the Court.

Respectfully submitted,

Dated: October 11, 2024

AMERICAN CIVIL LIBERTIES UNION
FOUNDATION

s/Marisol Dominguez-Ruiz

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Dated: October 11, 2024

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Attorney for Defendants

ATTESTATION OF SIGNATURES

I, Marisol Dominguez-Ruiz, hereby attest, pursuant to Local Civil Rule 5-1(i)(3) of the Northern District of California, that I have obtained the concurrence of each signatory hereto in the filing of this document.

Dated: October 11, 2024

s/Marisol Dominguez-Ruiz
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